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U.S. BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

Case Number : 1-18-45675-ess

-----X  
In Re:

Chapter : 11

Strength of a Woman, Inc.

Debtor  
-----X

**SYMONOUS HARRIS REPLY TO DEBTOR'S AFFIRMATION IN OPPOSITION TO  
RELIEF FROM THE AUTOMATIC STAY.**

Symonous Harris proceeding pro se not having an attorney and also not waiving rights to counsel states the following.

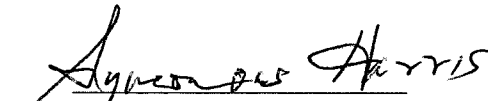
1. Symonous Harris objects and opposes the affirmation of Donna Green the debtor's attorney as hearsay the attorneys affirmation or testimony cannot be received as evidence. Miss Green was not an eyewitness to the circumstances and to the events alleged in her affirmation. "An attorney for the plaintiff cannot admit evidence into the court. He is either an attorney or a witness". See (Trinsey v. Pagliaro D.C.Pa. 1964, 229 F. Supp. 647).
2. Symonous Harris has shown by statement from her attorney that the lease Miss Audrey Thomas has been presenting is fraudulent. Which he did as a competent --fact witness being that he was the one who created the and filed the corporation and showed that there were no such persons by the name of ~~Samuel~~ <sup>Albert</sup> Bernstein or any other persons <sup>(ST)</sup> bearing the name Bernstein..
3. This is first hand Knowledge . miss Green does not have first hand knowledge.

4. “Where there are no depositions, admissions, or affidavits the court has no facts to rely on for a summary determination.” See Trinsey v. Pagliaro, D.C. Pa. 1964, 229 F. Supp. 647. Frunzar v. Allied Property and Casualty Ins. Co., (Iowa 1996)† 548 N.W.2d 880 Professional statements of litigants attorney are treated as affidavits, and attorney making statements may be cross-examined regarding substance of statement.
5. Secondly counsel has raised the doctrine or statutory standard of cause based on the “Sonnax factors”
6. The statutory standard of “cause” carries with it a list of 12 factors courts consider in determining whether it has been established. These factors have come to be known as the “Sonnax factors,” named after a decision rendered by the Second Circuit Court of Appeals in In re Sonnax Industries, Inc., 907 F.2d 1280, 1286 (2d Cir. 1990).
7. 12 factors which Counsel has so eloquently enumerated in her affirmation.
8. Counsel raises that there is another action pending in the state court wherein lies the debtor’s interest wherein an action was brought against Symonous Harris for alleged grossly exaggerated attorney fees attorneys. For alleged work never done.
9. In Hensley v. Eckerhart,<sup>6</sup> the Supreme Court endorsed the twelve factor reasonableness test established by the Fifth Circuit in Johnson v. Georgia Highway Express, Inc
10. The bankruptcy debtor has engaged in bad faith in the commencement of the bankruptcy filing. Not excluding the fact that the debtor is squatting in my property .

11. The debtor only filed the instant bankruptcy proceedings to evade an eviction proceeding when the marshal served her notice and warrant of eviction. In order for me to gain possession of my property.
12. I also have a judgment for use and occupancy which has accrued since its issue.
13. The debtor does not have equity in the property and the property is not necessary to an effective reorganization that the property is not necessary for the debtor to have a successful Chapter 11.

**WHEREFORE** The Sonnox factor is the impact of the automatic stay on the parties and the balance of the harms. Even though the automatic stay is damaging to me. Symonous Harris hereby request leave of court to file a more definite statement with regards to the 12 factors underlying the "Sonnox Factors". Furthermore to request that and adjournment of the proceedings to amend this reply to address all the exhibits submitted by debtor. Further I request this based on the voluminous nature of the instant proceedings, the fact that I am also involved in several other cases and as I pro se litigant I require more time in the interest and my right to due process. Symonous Harris request the lift the stay or in the alternative court grant the within and for further and other relief as the court deems just and proper

Dated: 3/1/19

  
Symonous Harris

To: Donna Este-Green, Esq.  
Attorney for debtor  
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Hempstead , NY 11550